



CALIFORNIA FIRE CHIEFS ASSOCIATION

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Administrative Fire Services
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Section

Fire Operations
Officers Section

Fire Prevention
Officers Section

Legislative Section

Professional Development
Committee

Training Officers
Section

California Building Standards Commission

2525 Natomas Park Drive, Suite 130

Sacramento, CA 95833

cbsc@dgs.ca.gov

Attn: Thomas L. Morrison, Deputy Executive Director

Re: NOTICE OF PROPOSED CHANGES TO THE CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2 (BUILDING CODE)

On behalf of the California Fire Chief's Association, I am writing to express fire service **SUPPORT** of the State Fire Marshal's (SFM) proposed amendments to the International Fire and Building Codes. We applaud their effort and process and believe these changes are necessary in order to provide a reasonable degree of fire and life safety to the businesses and residents of California.

To that end, we would like to emphasize our support of the changes proposed to modify the building area and height limitations of the International Building Code. Specifically, these include sections; 504.2, 506.3, 506.4 and 506.4.1. Many representatives of the California Fire Chief's Association worked with California Building Officials and other stakeholders to assist in the development of the changes proposed by the State Fire Marshal. Under the guidance of

Chief Grijalva, a holistic review was completed and the recommendations found in the package represent a consensus opinion of all stakeholders, including firefighters and fire prevention professionals. The justification for the amendments is well stated in the Office of the SFM's Initial Statement of Reasons. These changes are essential for public safety, firefighter safety and protection of property in California communities.

In addition, we would also like to inform you that, while we understand their reason, we **DO NOT SUPPORT** the amendments proposed by Housing and Community Development to IBC 310.1 (defining a townhouse as an "R-3"), IBC 419.4 (allowing a 2-hour wall between dwellings rather than requiring construction as two separate dwellings) and IBC 903.2.7 and the correlating SFM requirement to the same section. Section 903.2.7 provides an exception to the model code language that will exempt one- and two- family dwellings and multiple single-family dwellings (townhouses) from the requirement for fire sprinkler protection. The justification is that another model code (the International Residential Code), may be proposed for statewide adoption and does not contain this requirement. All three of these sections will reduce protection in the occupancies with the worse loss records in terms of deaths, injuries and property loss in California.

Historically, residential fires lead structure fire statistics and continue to be the leading cause of both civilian and firefighter deaths. According to the National Fire Protection Association, 73 percent of fire deaths and 71 percent of injuries occur in residential properties, which also account for more firefighter deaths (41 percent of the 100 average annual deaths) and injuries (7 percent) than any other property type. One and two-family dwellings, where the majority of the U.S. population lives, dominate the residential statistics:

- 70 percent of residential structure fires,
- 76 percent of residential fire deaths,
- 68 percent of residential fire injuries,

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- 76 percent of residential fire dollar loss.

Although the fire problem is improving residential property fires have consistently caused 70 to 75 percent of total fire deaths; the trend is flat. In addition, injuries have increased 7 percent and dollar loss per fire increased a significant 22 percent.

As stated above, we understand their reason and would like to express our concern and urge the State Fire Marshal and Commission to consider an amendment to the IRC to require this much needed protection to lives and property when presented with the document for adoption.

If you have any question or need any additional information, please call at 415-878-2600

Sincerely,

[Marc Revere](#)

Marc A Revere, EFO, CFO

President, California Fire Chiefs Association